

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**ERIC DANTE PITT, for himself  
And on behalf of all similarly situated  
individuals,**

**Plaintiff,**

**Civil Action No. 3:11-cv-697**

**v.**

**KMART CORPORATION,  
A wholly owned subsidiary of Sears  
Holdings Corporation,**

**and**

**SEARS HOLDINGS CORPORATION,**

**Defendants.**

**DEFENDANTS' MOTION FOR AN EXTENSION OF TIME TO  
SUPPLEMENT THEIR PRIVILEGE LOG**

Kmart Corporation ("Kmart") and Sears Holdings Corporation ("Sears" and collectively with Kmart, "Defendants"), by counsel and pursuant to Federal Rule of Civil Procedure 6(b)(1), submit this Motion For an Extension of Time to Supplement Their Privilege Log. For the reasons set forth in the accompanying memorandum in support, Defendants respectfully request the Court grant their motion.

Dated: July 16, 2012

Respectfully Submitted,

**KMART CORPORATION &  
SEARS HOLDINGS CORPORATION**

By: /s/ John C. Lynch  
Of Counsel

John C. Lynch  
Virginia State Bar No. 39267  
*Attorney for Defendants*  
TROUTMAN SANDERS LLP  
222 Central Park Ave., Suite 2000  
Virginia Beach, Virginia 23462  
Telephone: (757) 687-7765  
Facsimile: (757) 687-1504  
Email: [john.lynch@troutmansanders.com](mailto:john.lynch@troutmansanders.com)

Alan D. Wingfield  
Virginia State Bar No. 27489  
*Attorney for Defendants.*  
TROUTMAN SANDERS LLP  
1001 Haxall Point (23219)  
P. O. Box 1122  
Richmond, VA 23218-1122  
Telephone: (804) 697-1350  
Facsimile: (804) 698-5172  
Email: [alan.wingfield@troutmansanders.com](mailto:alan.wingfield@troutmansanders.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of July, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

**Counsel for Plaintiff**

Christopher Colt North  
The Consumer and Employee Rights Law Firm  
751-A Thimble Shoals Blvd.  
Newport News, VA 23606  
[cnorthlaw@aol.com](mailto:cnorthlaw@aol.com)

Leonard A. Bennett  
Consumer Litigation Associates  
763 J Clyde Morris Boulevard, Suite 1A  
Newport News, Virginia 23601  
Email: [lenbennett@cox.net](mailto:lenbennett@cox.net)

/s/ John C. Lynch  
John C. Lynch  
Virginia State Bar No. 39267  
Attorney for Defendants  
TROUTMAN SANDERS LLP  
222 Central Park Ave., Suite 2000  
Virginia Beach, Virginia 23462  
Telephone: (757) 687-7765  
Facsimile: (757) 687-1504  
Email: [john.lynch@troutmansanders.com](mailto:john.lynch@troutmansanders.com)